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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91162503
Party	Plaintiff St. Louis Cardinals LLC
Correspondence Address	Mary L. Kevlin Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES mlk@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
Filer's e-mail	mel@cll.com, trademark@cll.com
Signature	/Maryann E. Licciardi/
Date	05/19/2010
Attachments	STL (NLM) - 91162503 - Motion on Consent to Continue Suspension 051910.PDF (3 pages)(12530 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 74/614,716

Filed: December 23, 1994 For Mark: STL and Design

Published in the Official Gazette: June 11, 1996

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ST. LOUIS CARDINALS, LLC,

Opposer, : Opposition No. 91162503

v.

NEGRO LEAGUES BASEBALL

MUSEUM, INC.,

Applicant.

Commissioner of Trademarks Attn: TTAB P.O. Box 1451 Alexandria, VA 22313

MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of six (6) months, until **November 19, 2010**. Applicant's counsel, Michael Elbein, consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made toward the resolution of the parties' dispute, which involves issues relating to the domestic and international intellectual property rights of each of the parties, and which is the subject of two U.S. oppositions between the parties and other pending opposition matters in Europe. The parties have agreed in principle to substantial key terms relating to the use and registration of their respective marks. Since the last continuance,

Ref. No. 21307.021

Opposer's in-house counsel has engaged in a series of internal discussions regarding the

substance of a settlement conference recently held between the parties, and the outstanding

settlement issues. The parties have scheduled a follow-up settlement conference for June 7,

2010, during which they will discuss, and make every effort to resolve, the remaining settlement

issues. The additional time is requested to allow the parties time to hold the follow-up settlement

conference and to further negotiate the outstanding settlement terms. If accepted, any settlement

agreement would resolve this Opposition without the need to continue with the Opposition, and

would also resolve other related U.S. and international matters.

If the Board grants this motion, in the event that the matter is taken out of suspense, the

parties request that six months of discovery be allowed and that the discovery cut off be reset to

six (6) months after the proceedings resume so that the parties will have the full period of

discovery in the event that the matter is not able to be resolved. The trial periods should be reset

accordingly.

Dated: New York, New York

May 19, 2010

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.

Attorneys for Opposer

By: /Maryann E. Licciardi/

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Certificate of Service

The undersigned hereby certifies that, on May 19, 2010, a true and complete copy of the foregoing Motion on Consent to Continue Suspension of Proceedings was sent via First Class Mail, postage prepaid, to Applicant's attorney Michael Elbein, Esq., Hovey Williams LLP, 10801 Mastin Blvd., 84 Corporate Woods, Overland Park, KS 66210.

Dated: New York, New York May 19, 2010

> /Maryann E. Licciardi/ Maryann E. Licciardi